

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

MEGAN PETE, an individual,

Plaintiff,

Civil Action No. 1:24-CV-24228-CMA

v.

MILAGRO ELIZABETH COOPER,
an individual,

Defendant.

JOINT [PROPOSED] VERDICT FORM

Pursuant to the Court's Amended Case Management and Scheduling Order (ECF 62), Plaintiff Megan Pete ("Ms. Pete") and Defendant Milagro Cooper ("Ms. Cooper") respectfully submits their proposed verdict form.

The parties respectfully reserve the right to amend their proposed verdict form prior to the time it is given to the jury, depending on the evidence received at trial, the Court's rulings, or any other factors that preclude a definitive submission at this time.

Dated: Miami, FL
September 12, 2025

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

/s/ John O'Sullivan

John O'Sullivan (Fla. Bar No. 143154)
Daniel L. Humphrey (Fla. Bar No. 1024695)
johnosullivan@quinnemanuel.com
danielhumphrey@quinnemanuel.com
2601 South Bayshore Drive, Suite 1500
Miami, FL 33133
(305) 402-4880

Mari F. Henderson (pro hac vice)
Marie Hayrapetian (pro hac vice)
Bomie Lee (pro hac vice)
Julian T. Schoen (pro hac vice)
marihenderson@quinnemanuel.com
mariehayrapetian@quinnemanuel.com
bomielee@quinnemanuel.com
julianschoen@quinnemanuel.com
865 South Figueroa Street, 10th Floor
Los Angeles, CA 90017
(213) 443-3000

Joanna E. Menillo (pro hac vice)
joannamenillo@quinnemanuel.com
295 Fifth Avenue
New York, NY 10016
(212) 849-7000

Attorneys for Plaintiff Megan Pete

ASILIA LAW, PC

/s/ Jeremy Alexander McLymont

Jeremy Alexander McLymont (Fla. Bar No.
1010776)
jeremy@asilialaw.com
33 SW 2nd Avenue, Suite 1100
Miami, FL 33130
(786) 420-3014

DIXON JUSTICE CENTER, APC
Ronda Dixon (pro hac vice)
ronda@dixonjusticecenter.com
400 Corporate Pointe, Suite 300
Culver City, CA 90230
(323) 641-2731

*Attorneys for Defendant Milagro Elizabeth
Cooper*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

MEGAN PETE, an individual,

Plaintiff,

v.

Civil Action No. 1:24-CV-24228-CMA

MILAGRO ELIZABETH COOPER,
an individual,

Defendant.

JOINT [PROPOSED] VERDICT FORM

In answering the following questions and filling out this Verdict Form, you are to follow the Court's Final Instructions to the Jury and any instructions provided in this Verdict Form. Your answer to each of the following must be unanimous.

We, the jury, unanimously answer the questions submitted to us as follows:

I. MS. PETE'S CLAIMS

COUNT ONE: DEFAMATION PER SE

Question 1: Do you find, by a preponderance of the evidence, that Ms. Cooper defamed Ms. Pete by making statements accusing Ms. Pete of committing perjury?

Yes _____ No _____

Regardless of whether your answer is "Yes" or "No," proceed to the next question.

Question 2: Do you find, by a preponderance of the evidence, that Ms. Cooper defamed Ms. Pete by making statements that Ms. Pete is mentally incapacitated?

Yes _____ No _____

Regardless of whether your answer is "Yes" or "No," proceed to the next question.

Question 3: Do you find, by a preponderance of the evidence, that Ms. Cooper defamed Ms. Pete by making statements that Ms. Pete suffers from alcoholism?

Yes _____ No _____

If you answered "Yes" to any one of Questions 1, 2, or 3, proceed to Question 4. If you answered "No" to all of those Questions, skip the remaining questions under "Count One: Defamation Per Se," and proceed to "Count Two: Promotion of an Altered Sexual Depiction."

Question 4: How much do you award Ms. Pete in special damages for her defamation claim, if any?

\$ _____

Regardless of whether your answer is “Yes” or “No,” proceed to the next question.

Question 5: Do you find, by clear and convincing evidence, that punitive damages are warranted against Ms. Cooper on Ms. Pete’s defamation claim?

Yes _____ **No** _____

If your answer is “Yes,” in what amount: _____

COUNT TWO: PROMOTION OF AN ALTERED SEXUAL DEPICTION

Question 6: Do you find, by a preponderance of the evidence, that Ms. Cooper willfully and maliciously promoted, without Ms. Pete's consent, a visual depiction of Ms. Pete that she knew or reasonably should have known was an altered sexual depiction?

Yes _____ **No** _____

If your answer is "Yes," proceed to the next question. If your answer is "No," skip the remaining question under "Count Two: Promotion of an Altered Sexual Depiction," and proceed to "Count Three: Intentional Infliction of Emotional Distress."

Question 7: Do you find, by a preponderance of the evidence, that Ms. Pete should be awarded statutory damages in the amount of \$10,000 or actual damages, whichever is greater, for each instance of a violation of Florida Statute § 836.13?

Yes _____ **No** _____

If your answer is "Yes," in what amount: _____

COUNT THREE: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

Question 8: Do you find, by a preponderance of the evidence, that Ms. Cooper intentionally or recklessly engaged in extreme and outrageous conduct toward Ms. Pete?

Yes _____ **No** _____

If your answer is “Yes,” proceed to the next question. If your answer is “No,” skip the remaining questions under “Count Three: Intentional Infliction of Emotional Distress,” and sign the Verdict Form.

Question 9: Do you find, by a preponderance of the evidence, that Ms. Pete suffered severe emotional distress as a result of Ms. Cooper’s extreme and outrageous conduct?

Yes _____ **No** _____

If your answer is “Yes,” proceed to the next question. If your answer is “No,” skip the remaining questions under “Count Three: Intentional Infliction of Emotional Distress,” and sign the Verdict Form.

Question 10: Do you find, by a preponderance of the evidence, that Ms. Pete should be awarded compensatory damages against Ms. Cooper on her intentional infliction of emotional distress claim?

Yes _____ **No** _____

If your answer is “Yes,” in what amount: _____

If you answered “Yes” to Question 10, skip Question 11 and proceed to Question 12. If you answered “No” to Question 10, proceed to Question 11.

Question 11: If you found that Ms. Pete is not entitled to compensatory damages, do you find, by a preponderance of the evidence, that Ms. Pete should be awarded nominal damages against Ms. Cooper?

Yes _____ **No** _____

If your answer is “Yes,” in what amount: _____

Regardless of whether your answer is “Yes” or “No,” proceed to the next question.

Question 12: Do you find, by clear and convincing evidence, that punitive damages are warranted against Ms. Cooper on Ms. Pete’s intentional infliction of emotional distress claim?

Yes _____ **No** _____

If your answer is “Yes,” in what amount: _____

Signed: _____

Presiding Juror

Dated: _____

You are finished. Please ensure the Verdict Form accurately reflects your unanimous decisions. Once signed by the Jury Foreperson, please notify the Court's Clerk that you have reached a verdict. The Jury Foreperson should maintain possession of this Verdict Form and bring it when the jury is brought back into the Courtroom.

COUNT ONE: DEFAMATION

Question 1: Do you find, by a preponderance of the evidence, that Ms. Cooper published a statement about Ms. Pete?

Yes _____

No _____

If you answered “Yes” proceed to the next question. If you answered “No” skip the remaining questions under “Count One: Defamation” and proceed to “Count Two: Promotion of an Altered Sexual Depiction.”

Question 2: Do you find, by a preponderance of the evidence, that Ms. Cooper’s statement was in some significant respect false?

Yes _____

No _____

If you answered “Yes” proceed to the next question. If you answered “No” skip the remaining questions under “Count One: Defamation” and proceed to “Count Two: Promotion of an Altered Sexual Depiction.”

Question 3: Do you find, by a clear and convincing evidence, that Ms. Cooper’s statement was made with actual malice?

Yes _____

No _____

If you answered “Yes” proceed to the next question. If you answered “No” skip the remaining questions under “Count One: Defamation” and proceed to “Count Two: Promotion of an Altered Sexual Depiction.”

Question 4: Do you find, by preponderance of the evidence, that Ms. Pete suffered actual damages?

Yes _____

No _____

If you answered “Yes” proceed to the next question. If you answered “No” skip the remaining questions under “Count One: Defamation” and proceed to “Count Two: Promotion of an Altered Sexual Depiction.”

Question 5: Do you find, by preponderance of the evidence, that Ms. Cooper’s defamatory statement was a legal cause of loss, injury, or damage to Ms. Pete?

Yes _____

No _____

If you answered “Yes” to all five of the previous question, proceed to Ms. Cooper’s defenses. If you answered “No” skip the remaining questions under “Count One: Defamation” and proceed to “Count Two: Promotion of an Altered Sexual Depiction.”

Ms. Cooper’s Affirmative Defense

Do you find, by a preponderance of the evidence, that Ms. Cooper has proved that her statements were substantially true?

Yes _____

No _____

If you answered “Yes” skip the remaining questions under “Count One: Defamation” and proceed to “Count Two: Promotion of an Altered Sexual Depiction.” If you answered “No” proceed to the next question.

Question 6: How much do you award Ms. Pete in actual damages for her defamation claim, if any?

\$ _____

Regardless of whether your answer is “Yes” or “No,” proceed to the next question.

Question 7: Do you find, by clear and convincing evidence, that punitive damages are warranted against Ms. Cooper on Ms. Pete’s defamation claim?

Yes _____

No _____

If your answer is “Yes,” in what amount: _____

COUNT TWO: PROMOTION OF AN ALTERED SEXUAL DEPICTION

Question 6: Do you find, by a preponderance of the evidence, that Ms. Cooper willfully and maliciously promoted, without Ms. Pete's consent, a visual depiction of Ms. Pete that she knew or reasonably should have known was an altered sexual depiction?

Yes _____

No _____

If your answer is "Yes," proceed to the next question. If your answer is "No," skip the remaining question under "Count Two: Promotion of an Altered Sexual Depiction," and proceed to "Count Three: Intentional Infliction of Emotional Distress."

Question 7: Do you find, by a preponderance of the evidence, that Ms. Pete should be awarded statutory damages in the amount of \$10,000 or actual damages, whichever is greater, for each instance of a violation of Florida Statute § 836.13?

Yes _____

No _____

If your answer is "Yes," in what amount: _____

COUNT THREE: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

Question 8: Do you find, by a preponderance of the evidence, that Ms. Cooper intentionally or recklessly engaged in extreme and outrageous conduct toward Ms. Pete?

Yes _____

No _____

If your answer is “Yes,” proceed to the next question. If your answer is “No,” skip the remaining questions under “Count Three: Intentional Infliction of Emotional Distress,” and sign the Verdict Form.

Question 9: Do you find, by a preponderance of the evidence, that Ms. Pete suffered severe emotional distress as a result of Ms. Cooper’s extreme and outrageous conduct?

Yes _____

No _____

If your answer is “Yes,” proceed to the next question. If your answer is “No,” skip the remaining questions under “Count Three: Intentional Infliction of Emotional Distress,” and sign the Verdict Form.

Question 10: Do you find, by a preponderance of the evidence, that Ms. Cooper caused Ms. Pete to suffer severe emotional distress?

Yes _____

No _____

If your answer is “Yes,” proceed to the next question. If your answer is “No,” skip the remaining questions under “Count Three: Intentional Infliction of Emotional Distress,” and sign the Verdict Form.

If you answered “Yes” to all three of the previous question, proceed to Ms. Cooper’s defenses. If you answered “No” skip the remaining questions under “Count three: “Intentional Infliction of Emotional Distress” and sign the Verdict Form.

Ms. Cooper’s Affirmative Defense

Do you find, by preponderance of the evidence, that Ms. Pete’s claim is subject to the single publication rule?

Yes _____

No _____

If you answered “Yes” skip the remaining questions under “Count three: “Intentional Infliction of Emotional Distress” and sign the Verdict Form. If you answered “No” proceed to the next question.

Question 11: Do you find, by a preponderance of the evidence, that Ms. Pete should be awarded compensatory damages against Ms. Cooper on her intentional infliction of emotional distress claim?

Yes _____

No _____

If your answer is “Yes,” in what amount: _____

If you answered “Yes” to Question 11, skip Question 12 and proceed to Question 13. If you answered “No” to Question 10, proceed to Question 11.

Question 11: If you found that Ms. Pete is not entitled to compensatory damages, do you find, by a preponderance of the evidence, that Ms. Pete should be awarded nominal damages against Ms. Cooper?

Yes _____

No _____

If your answer is "Yes," in what amount: _____

Regardless of whether your answer is "Yes" or "No," proceed to the next question.

Question 12: Do you find, by clear and convincing evidence, that punitive damages are warranted against Ms. Cooper on Ms. Pete's intentional infliction of emotional distress claim?

Yes _____

No _____

If your answer is "Yes," in what amount: _____

Signed: _____

Presiding Juror

Dated: _____

You are finished. Please ensure the Verdict Form accurately reflects your unanimous decisions. Once signed by the Jury Foreperson, please notify the Court's Clerk that you have reached a verdict. The Jury Foreperson should maintain possession of this Verdict Form and bring it when the jury is brought back into the Courtroom.